

TABLE 2.2

## FM ALLOCATION STUDY - CHANNEL 247A (97.3 mHz) - ARCADIA, MO

LYLE BROADCASTING CORP.  
CARBONDALE, IL

STUDY COORDINATES: 37/35/00 90/38/00

STATION -----	LOCATION -----	CHANNEL -----	CLASS -----	SPACING (km) -----	REQUIRED SPACING* (km) -----	NOTES -----
BPH921112MH	Bourbon, MO	244	A	73.41	31.0	4, 7, 8
KAHR	Poplar Bluff, MO	244	A	91.67	31.0	
KCUF	Mountain View, MO	245	C2	122.16	55.0	
KXOKFM	Florissant, MO	246	C1	133.00	133.0	
BPH960424MC	Marble Hill, MO	247	A	53.67	115.0	2, 3, 11 9
96-204	Tiptonville, TN	247	A	171.60	115.0	
KXUS	Springfield, MO	247	C1	216.18	200.0	
WRUL	Carmi, IL	247	B	221.15	178.0	
KDAA	Rolla, MO	248	A	108.28	72.0	1
KUEA	Doniphan, MO	248	C2	111.59	106.0	
951108MT	Breese, IL	248	A	148.20	72.0	7
ALLOTMENT	Breese, IL	248	A	153.19	72.0	12
951108MG	Breese, IL	248	A	153.94	72.0	7
951108MV	Breese, IL	248	A	157.48	72.0	7
KHCR	Potosi, MO	249	C3	43.19	42.0	2
KBXB	Sikeston, MO	250	C3	108.91	42.0	
KBXB	Sikeston, MO	250	C2	108.91	55.0	1, 2
KCLQ	Lebanon, MO	300	C2	181.66	15.0	1

\* Required Spacing Per Section 73.207 of The FCC Rules

## Notes:

- |                                      |                                  |
|--------------------------------------|----------------------------------|
| 1 - Applied For Under Section 73.215 | 7 - Pending Application          |
| 2 - Construction Permit              | 8 - Petition For Reconsideration |
| 3 - Channel Deletion Proposed        | 9 - Proposed Rulemaking          |
| 4 - Move From This Channel Ordered   | 10 - Rulemaking Petition         |
| 5 - Move to This Channel Ordered     | 11 - Short-Spaced                |
| 6 - One Step Reference Site          | 12 - Vacant Allotment            |

TABLE 2.3

FM ALLOCATION STUDY - CHANNEL 228A (93.5 MHz) - MARBLE HILL, MO

LYLE BROADCASTING CORP.  
CARBONDALE, IL

STUDY COORDINATES: 37/22/50 90/04/57

STATION	LOCATION	CHANNEL	CLASS	SPACING (km)	REQUIRED SPACING*	NOTES
KYLSFM	Ironton, MO	225	A	58.08	31.0	1, 2, 3
KMAL	Malden, MO	225	C2	83.63	55.0	9
KMAL	Malden, MO	225	C3	92.39	42.0	1, 2, 3
KBDZ	Perryville, MO	226	A	32.36	31.0	
KNSX	Steelville, MO	227	C2	116.63	106.0	
WKYQ	Paducah, KY	227	C1	135.41	133.0	
KBKG	Corning, AR	228	A	117.66	115.0	
WKBLFM	Covington, TN	228	A	202.98	115.0	
KYLC	Osage Beach, MO	228	C3	241.50	142.0	5, 12
KYLC	Osage Beach, MO	228	C2	243.15	166.0	7
KSD	St. Louis, MO	229	C1	133.61	133.0	
951127MD	Scott City, MO	230	A	48.15	31.0	7
951127ME	Scott City, MO	230	A	48.85	31.0	7
BPH951127MG	Scott City, MO	230	A	49.36	31.0	7
ALLOTMENT	Scott City, MO	230	A	52.72	31.0	12
951127MC	Scott City, MO	230	A	53.17	31.0	7
BPH951128MC	Scott City, MO	230	A	56.07	31.0	7
KSPQ	West Plains, MO	230	C1	167.29	75.0	
BPH921112MH	Bourbon, MO	231	A	129.14	31.0	5, 8, 12
WMIXFM	Mount Vernon, IL	231	B	149.98	69.0	
KMHM	Lutesville, MO	281	A	13.12	10.0	
KDBB	Bonne Terre, MO	282	A	63.04	10.0	
WCCZ	Pinckneyville, IL	282	A	107.39	10.0	1, 2

\* Required Spacing Per Section 73.207 of The FCC Rules

TABLE 2.3 (cont'd)

FM ALLOCATION STUDY - CHANNEL 228A (93.5 MHz) - MARBLE HILL, MO

-----  
LYLE BROADCASTING CORP.  
CARBONDALE, IL

Notes:

- |                                      |                                  |
|--------------------------------------|----------------------------------|
| 1 - Applied For Under Section 73.215 | 7 - Pending Application          |
| 2 - Construction Permit              | 8 - Petition For Reconsideration |
| 3 - Channel Deletion Proposed        | 9 - Proposed Rulemaking          |
| 4 - Move From This Channel Ordered   | 10 - Rulemaking Petition         |
| 5 - Move to This Channel Ordered     | 11 - Short-Spaced                |
| 6 - One Step Reference Site          | 12 - Vacant Allotment            |

TABLE 2.4

## FM ALLOCATION STUDY - CHANNEL 280A (103.9 MHz) - ARCADIA, MO

LYLE BROADCASTING CORP.  
CARBONDALE, IL

STUDY COORDINATES: 37/32/30 90/43/00

STATION	LOCATION	CHANNEL	CLASS	SPACING (km)	REQUIRED SPACING*	NOTES
KBDZ	Perryville, MO	226	A	69.69	10.0	
KNSX	Steelville, MO	227	C2	68.71	15.0	
KLOU	St. Louis, MO	277	C1	115.62	75.0	
KZMA	Poplar Bluff, MO	278	C2	84.33	55.0	2
KJEL	Lebanon, MO	279	C	181.78	165.0	
BPH970327MG	Ellington, MO	280	A	37.27	115.0	2, 11
WXAN	Ava, IL	280	A	115.47	115.0	
97-120	Gideon, MO	280	A	137.09	115.0	9
KPOCFM	Pocahontas, AR	280	A	141.98	115.0	4
KMCR	Montgomery City, MO	280	A	174.89	115.0	
951017ME	Earle, AR	280	C3	239.27	142.0	7
951020MF	Earle, AR	280	C3	241.05	142.0	7
KMHM	Lutesville, MO	281	A	71.56	72.0	
KPOCFM	Pocahontas, AR	281	A	141.98	72.0	1, 2, 5
WALC	Jerseyville, IL	281	C2	150.59	106.0	
BPH941118MD	Jefferson City, MO	281	A	171.02	72.0	7
ALLOTMENT	Jefferson City, MO	281	A	171.80	72.0	12
BPH941118ME	Jefferson City, MO	281	A	171.98	72.0	7
KDBB	Bonne Terre, MO	282	A	31.86	31.0	
89-120	Northweye, MO	283	A	105.89	31.0	8, 9
ALLOTMENT	Doolittle, MO	283	A	114.10	31.0	12
BPH920506ME	Doolittle, MO	283	A	114.24	31.0	1, 7
KSLQFM	Washington, MO	283	A	119.11	31.0	
KSLQFM	Washington, MO	283	A	119.11	31.0	1, 2

\* Required Spacing Per Section 73.207 of The FCC Rules

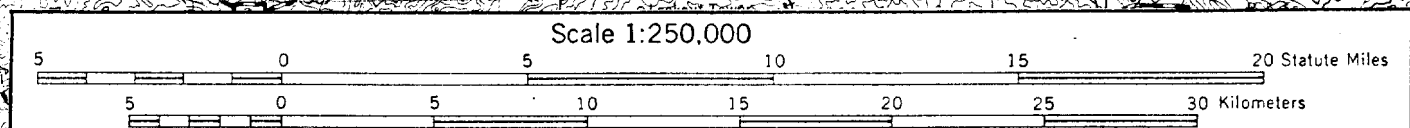
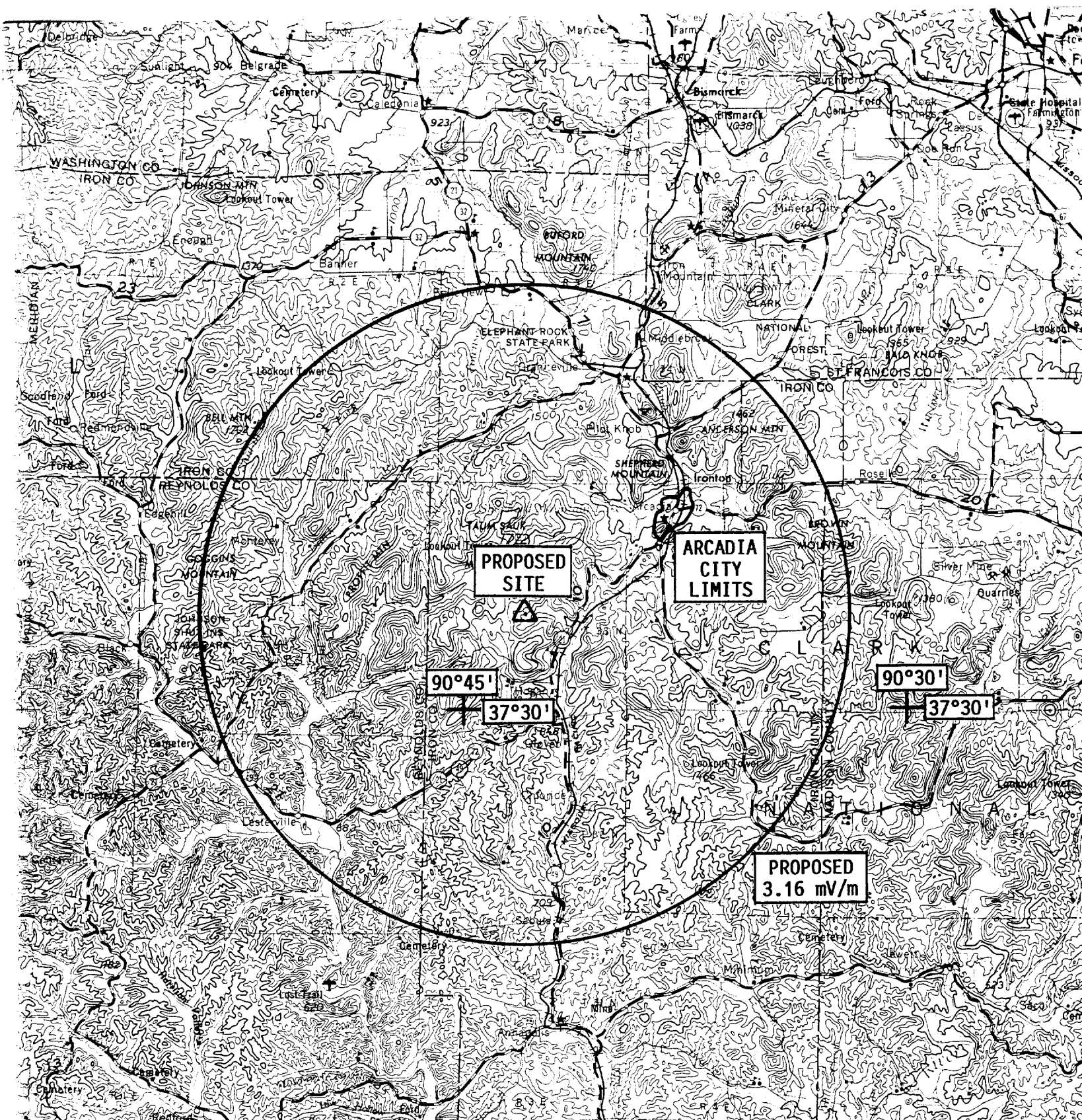
TABLE 2.4 (cont'd)

FM ALLOCATION STUDY - CHANNEL 280A (103.9 MHz) - ARCADIA, MO

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LYLE BROADCASTING CORP.  
CARBONDALE, IL

Notes:

- |                                      |                                  |
|--------------------------------------|----------------------------------|
| 1 - Applied For Under Section 73.215 | 7 - Pending Application          |
| 2 - Construction Permit              | 8 - Petition For Reconsideration |
| 3 - Channel Deletion Proposed        | 9 - Proposed Rulemaking          |
| 4 - Move From This Channel Ordered   | 10 - Rulemaking Petition         |
| 5 - Move to This Channel Ordered     | 11 - Short-Spaced                |
| 6 - One Step Reference Site          | 12 - Vacant Allotment            |



CARL E. SMITH CONSULTING ENGINEERS  
2324 N. CLEVE-MASS RD., BOX 807  
BATH, OHIO 44210-0807  
216/659-4440

FIG. 2.4  
PREDICTED CITY GRADE CONTOUR  
CHANNEL 280A - ARCADIA, MO  
Lyle Broadcasting Corp.  
Carbondale, IL

TABLE 2.5

FM ALLOCATION STUDY - CHANNEL 292A (106.3 MHz) - ELLINGTON, MO

LYLE BROADCASTING CORP.  
CARBONDALE, IL

STUDY COORDINATES: 37/13/27 90/51/13

STATION -----	LOCATION -----	CHANNEL -----	CLASS -----	SPACING (km) -----	REQUIRED SPACING* (km) -----	NOTES -----
KJEZ	Poplar Bluff, MO	238	C1	62.54	22.0	
KWWR	Mexico, MO	239	C	238.57	29.0	
KPNT	St. Genevieve, MO	289	C	112.78	95.0	
KGBXFM	Nixa, MO	290	C2	204.11	55.0	
KWKZ	Charleston, MO	291	C2	110.73	106.0	1
KBXR	Ashland, MO	291	C1	226.82	133.0	1, 2, 5
KRLWFM	Walnut Ridge, AR	292	A	128.74	115.0	
WQRL	Benton, IL	292	B1	207.32	143.0	
KRZK	Branson, MO	292	C3	213.17	142.0	4
KRZK	Branson, MO	292	C2	213.17	166.0	1, 2, 5
KELEFM	Mountain Grove, MO	293	A	124.37	72.0	4
ALLOTMENT	Horseshoe Bend, AR	293	A	131.29	72.0	12
BPH970407MM	Horseshoe Bend, AR	293	A	131.93	72.0	7
KMISFM	New Madrid, MO	293	C2	136.42	106.0	
WKKX	Granite City, IL	293	C1	156.80	133.0	
KKCN	Trumann, AR	294	A	165.08	31.0	
KTXY	Jefferson City, MO	295	C	213.04	95.0	

\* Required Spacing Per Section 73.207 of The FCC Rules

## Notes:

- |                                      |                                  |
|--------------------------------------|----------------------------------|
| 1 - Applied For Under Section 73.215 | 7 - Pending Application          |
| 2 - Construction Permit              | 8 - Petition For Reconsideration |
| 3 - Channel Deletion Proposed        | 9 - Proposed Rulemaking          |
| 4 - Move From This Channel Ordered   | 10 - Rulemaking Petition         |
| 5 - Move to This Channel Ordered     | 11 - Short-Spaced                |
| 6 - One Step Reference Site          | 12 - Vacant Allotment            |

TABLE 2.6

## FM ALLOCATION STUDY - CHANNEL 294A (106.7 MHz) - ELLINGTON, MO

LYLE BROADCASTING CORP.  
CARBONDALE, IL

STUDY COORDINATES: 37/13/27 90/51/13

STATION -----	LOCATION -----	CHANNEL -----	CLASS -----	SPACING (km) -----	REQUIRED SPACING* (km) -----	NOTES -----
KYLSFM	Ironton, MO	240	C3	38.42	12.0	9
KMMC	Salem, MO	240	A	75.49	10.0	3
KCWD	Harrison, AR	241	C2	230.70	15.0	1
KWKZ	Charleston, MO	291	C2	110.73	55.0	1
KRLWFM	Walnut Ridge, AR	292	A	128.74	31.0	
KELEFM	Mountain Grove, MO	293	A	124.37	72.0	4
ALLOTMENT	Horseshoe Bend, AR	293	A	131.29	72.0	12
BPH970407MM	Horseshoe Bend, AR	293	A	131.93	72.0	7
KMISFM	New Madrid, MO	293	C2	136.42	106.0	
WKKX	Granite City, IL	293	C1	156.80	133.0	
KKCN	Trumann, AR	294	A	165.08	115.0	
KTXV	Jefferson City, MO	295	C	213.04	165.0	
KBMVFM	Birch Tree, MO	296	A	67.20	31.0	4
KBMVFM	Birch Tree, MO	296	C3	67.20	42.0	1, 2, 5
951124ME	Miner, MO	296	A	107.54	31.0	7
951127MF	Miner, MO	296	A	108.89	31.0	7
BPH951128MB	Miner, MO	296	A	109.45	31.0	7
ALLOTMENT	Miner, MO	296	A	110.80	31.0	12
ALLOTMENT	Cuba, MO	297	C3	105.18	42.0	12
89-120	Cuba, MO	297	A	105.33	31.0	8, 9
BPH960207MB	Cuba, MO	297	C3	106.32	42.0	7

\* Required Spacing Per Section 73.207 of The FCC Rules



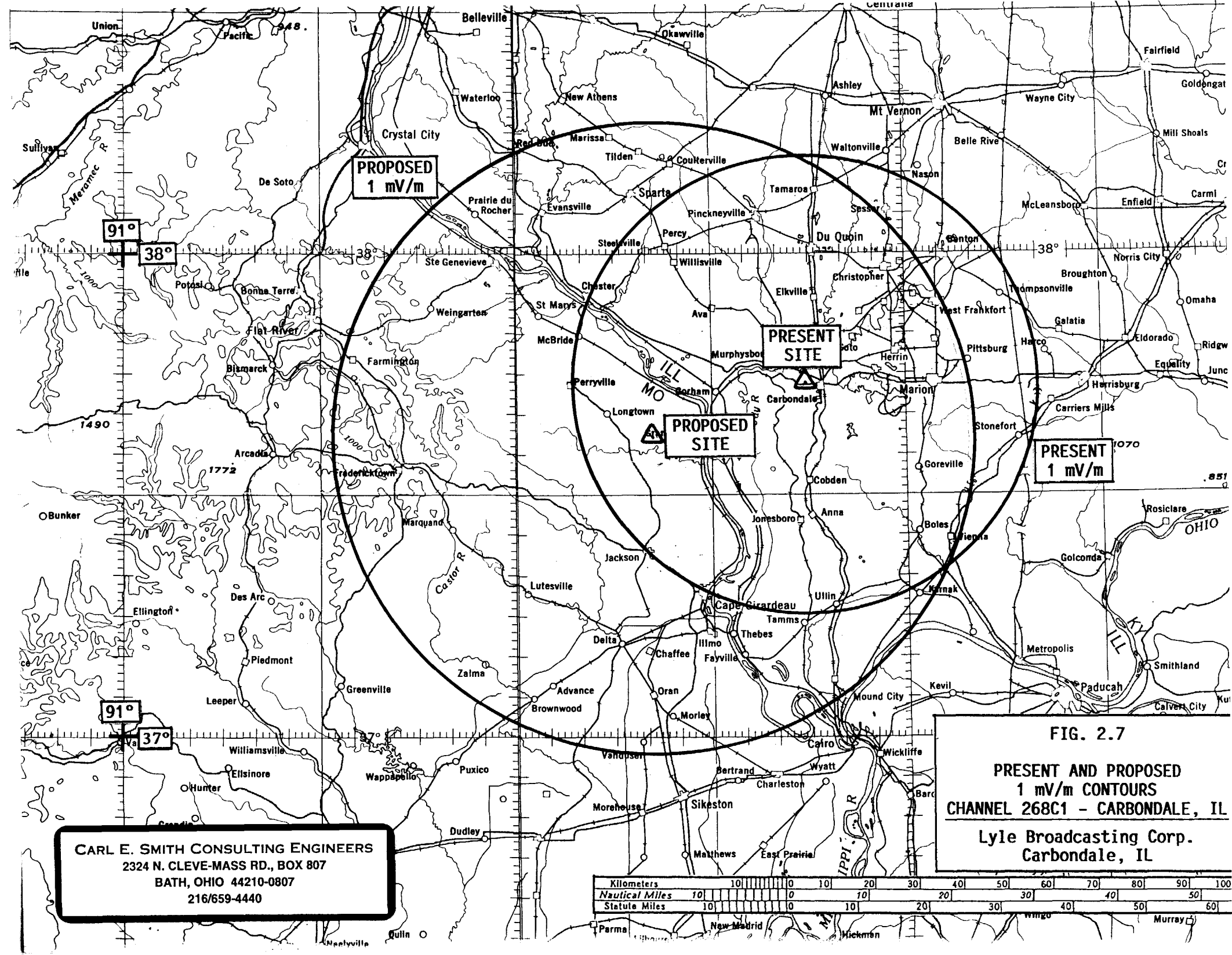
TABLE 2.6 (cont'd)

FM ALLOCATION STUDY - CHANNEL 294A (106.7 MHz) - ELLINGTON, MO

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LYLE BROADCASTING CORP.  
CARBONDALE, IL

Notes:

- |                                      |                                  |
|--------------------------------------|----------------------------------|
| 1 - Applied For Under Section 73.215 | 7 - Pending Application          |
| 2 - Construction Permit              | 8 - Petition For Reconsideration |
| 3 - Channel Deletion Proposed        | 9 - Proposed Rulemaking          |
| 4 - Move From This Channel Ordered   | 10 - Rulemaking Petition         |
| 5 - Move to This Channel Ordered     | 11 - Short-Spaced                |
| 6 - One Step Reference Site          | 12 - Vacant Allotment            |



**PROPOSED  
1 mV/m**

**PRESENT  
SITE**

**PROPOSED  
SITE**

**PRESENT  
1 mV/m**

**FIG. 2.7**  
**PRESENT AND PROPOSED  
1 mV/m CONTOURS  
CHANNEL 268C1 - CARBONDALE, IL**  
**Lyle Broadcasting Corp.**  
**Carbondale, IL**

**CARL E. SMITH CONSULTING ENGINEERS**  
2324 N. CLEVE-MASS RD., BOX 807  
BATH, OHIO 44210-0807  
216/659-4440

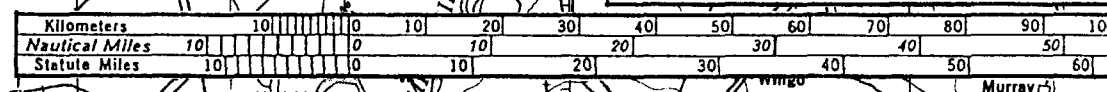


TABLE 2.7

PRESENT AND PROPOSED  
AREA AND POPULATION  
CHANNEL 268C1 - CARBONDALE, IL  
Lyle Broadcasting Corp.  
Carbondale, IL

	Area ( <u>Square Kilometers</u> )	Population ( <u>1990 Census</u> )
Present	8,560.3	245,026
Gain	9,182.9	156,278
Loss	1,321.2	27,503
Proposed	16,422.0	373,801
Net Gain	7,861.7	128,775

### 3.0 - ALTERNATE COUNTERPROPOSAL - CHANNEL 268C1 - STEELEVILLE, IL

If it is not possible to modify the site restriction on the vacant allotment on Channel 267C3 in Tiptonville, Tennessee, to accommodate the allotment of Channel 268C1 to Carbondale, Illinois, it is alternately proposed to substitute Channel 268C1 in Steeleville, Illinois, for Channel 268B in Carbondale, and modify the license of WCIL-FM to specify operation on Channel 268C1 in Steeleville as its first local service.

The geographic reference coordinates for Steeleville are:

NL - 38° 00' 20"

WL - 89° 39' 30"

The studies contained in this section of this exhibit were conducted from a site 40.2 kilometers south of Steeleville:

NL - 37° 39' 10"

WL - 89° 45' 30"

This site falls within Zone II, as defined by Section 73.205(c) of the FCC Rules. Accordingly, as outlined in Section 73.210(a) of the FCC Rules, the allotment of a Class C1 channel is permitted from these coordinates.

Table 3.0 is an FM allocation study for Channel 268C1 from the site described above. An examination of this table shows that operation on Channel 268C1 from this site would be short spaced to the present operation of WCIL-FM on Channel 268B in Carbondale and the proposal in MM Docket 97-168 to allot Channel 269A to Arcadia, Missouri. Pursuant to the rounding provisions of Section 73.208(c)(8) of the FCC Rules, the 143.66 kilometer spacing to the vacant allotment on Channel 267C3 in Tiptonville, Tennessee, is considered to comply with the required spacing of 144 kilometers and the 132.62 kilometer spacing to WGEL - Greenville, Illinois, is considered to comply with the required spacing of 133 kilometers.

The short spacing to the present operation of WCIL-FM on Channel 268B in Carbondale will not pose any problems, since this channel will be deleted if Channel 268C1 is allotted to Steeleville, as proposed herein. Furthermore, under the provisions of Sections 1.420(g) and 1.420(i) of the FCC Rules, this conflict with the existing operation of WCIL-FM will permit the license of WCIL-FM to be modified to specify operation on Channel 268C1 in Steeleville, regardless of other expressions of interest which might be received.

The short spacing to the proposal to allot Channel 269A to Arcadia can be eliminated in the same manner as described in Section 2.0 of this exhibit by allotting an alternate Class A channel to Arcadia, in lieu of Channel 269A. This would involve either allotting Channel 247A to Arcadia and substituting Channel 228A for Channel 247A in Marble Hill, Missouri, or allotting Channel 280A to Arcadia and substituting either Channel 292A or Channel 294A for Channel 280A in Ellington, Missouri.

Figure 3.0 is a map exhibit depicting the predicted 3.16 mV/m (city grade) contour for the site specified above for Channel 268C1 in Steeleville. This contour was projected assuming maximum Class C1 facilities of 100 kilowatts effective radiated power at 299 meters above average terrain, assuming uniform terrain. As shown in this figure, it will be possible to provide city grade service to all of Steeleville on Channel 268C1 from a site which will meet all of the spacing requirements to other facilities requiring protection consideration, provided that an alternate Class A channel is allotted to Arcadia, as discussed above.

The city grade contour depicted in Figure 3.0 does not encompass any portion of any urbanized area, as defined by the 1990 U. S. Census. Nor does any portion of

Steeleville fall within such an urbanized area. Thus, no showing is required to document the independence of Steeleville from any such urbanized area.

It should be noted that Steeleville (population 2059<sup>1</sup>) presently has no local radio service. Thus, the alternate proposal outlined herein would provide Steeleville with its first local service, advancing the FCC's allotment priorities. Furthermore, the deletion of Channel 268B would not deprive Carbondale (population 27,033) of its only local service, as AM station WCIL and noncommercial educational FM stations WDBX and WSIU would remain licensed to Carbondale.

Figure 3.1 is a map exhibit showing the predicted 1 mV/m contour for Channel 268C1 in Steeleville for operation with maximum Class C1 facilities from the coordinates outlined above. This figure also shows the predicted 1 mV/m contour for operation by WCIL-FM with maximum Class B facilities from its present site. Both of these contours were projected assuming uniform terrain. Table 3.1 presents detailed data on the present and proposed populations and areas, as well as the loss and gain areas. It should be noted that the entire loss area is well served, receiving five or more full time aural services in addition to the present service from WCIL-FM. Furthermore, the entire gain area receives at least two full time aural services. Thus, the proposed upgrade of WCIL-FM, in conjunction with the reallocation of this channel from Carbondale to Steeleville will not provide a second aural service to any area.

In summary, Channel 268C1 in Steeleville, Illinois, can be substituted for Channel 268B in Carbondale, Illinois, for use by WCIL-FM with a site restriction 40.2 kilometers south of the community, provided that either Channel 247A or Channel 280A is allotted

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<sup>1</sup>All population data in this exhibit is extracted from the 1990 U. S. Census.

to Arcadia, Missouri, in lieu of the proposed allotment of Channel 269A. The allotment of Channel 247A to Arcadia will require the substitution of Channel 228A for Channel 247A in Marble Hill, Missouri, and the allotment of Channel 280A to Arcadia will require the substitution of either Channel 292A or Channel 294A for Channel 280A in Ellington.

TABLE 3.0

## FM ALLOCATION STUDY - CHANNEL 268C1 (101.5 MHz) - STEELEVILLE, IL

LYLE BROADCASTING CORP.  
CARBONDALE, IL

STUDY COORDINATES: 37/39/10 89/45/30

STATION	LOCATION	CHANNEL	CLASS	SPACING (km)	REQUIRED SPACING* (km)	NOTES
KWMU	St. Louis, MO	214	C	114.50	41.0	
KRCU	Cape Girardeau, MO	215	A	42.94	22.0	
KTUIFM	Sullivan, MO	265	A	139.26	75.0	
WVRV	East St. Louis, IL	266	C2	120.13	79.0	1
ALLOTMENT	Tiptonville, TN	267	C3	143.66	144.0	3, 12
WCMTFM	Martin, TN	267	C3	152.66	144.0	9
96-220	Sturgis, KY	267	A	157.03	133.0	9
96-204	Princeton, KY	267	A	168.71	133.0	9
WMC1	Neoga, IL	267	B1	214.24	161.0	
KTXR	Springfield, MO	267	C	285.71	209.0	
WCILFM	Carbondale, IL	268	B	44.95	270.0	11
WBGW	Fort Branch, IN	268	A	208.10	200.0	
WTPRFM	McKinnon, TN	268	A	210.62	200.0	
WNWSFM	Jackson, TN	268	A	239.21	200.0	
KPLA	Columbia, MO	268	C2	255.58	224.0	1, 2, 4
KPLA	Columbia, MO	268	C1	267.00	245.0	1, 5, 7
KPLA	Columbia, MO	268	C1	279.38	245.0	5, 12
WBNQ	Bloomington, IL	268	B	317.22	270.0	1, 2
WBNQ	Bloomington, IL	268	B	318.17	270.0	
97-168	Arcadia, MO	269	A	72.29	133.0	9, 11
WGEL	Greenville, IL	269	A	132.62	133.0	
KLPW	Union, MO	269	A	145.65	133.0	
KLPWFM	Union, MO	269	A	145.65	133.0	7
WCMTFM	Martin, TN	269	A	164.47	133.0	3
WTYE	Robinson, IL	269	A	229.38	133.0	
KIYS	Jonesboro, AR	270	C	206.22	105.0	
WAJT	Mount Vernon, IL	271	B1	99.51	77.0	2
WAJT	Mount Vernon, IL	271	B1	99.51	77.0	7
WCBF	Clinton, KY	271	C3	133.09	76.0	
KFXEFM	Cuba, MO	271	A	152.36	75.0	2, 3, 8

\* Required Spacing Per Section 73.207 of The FCC Rules



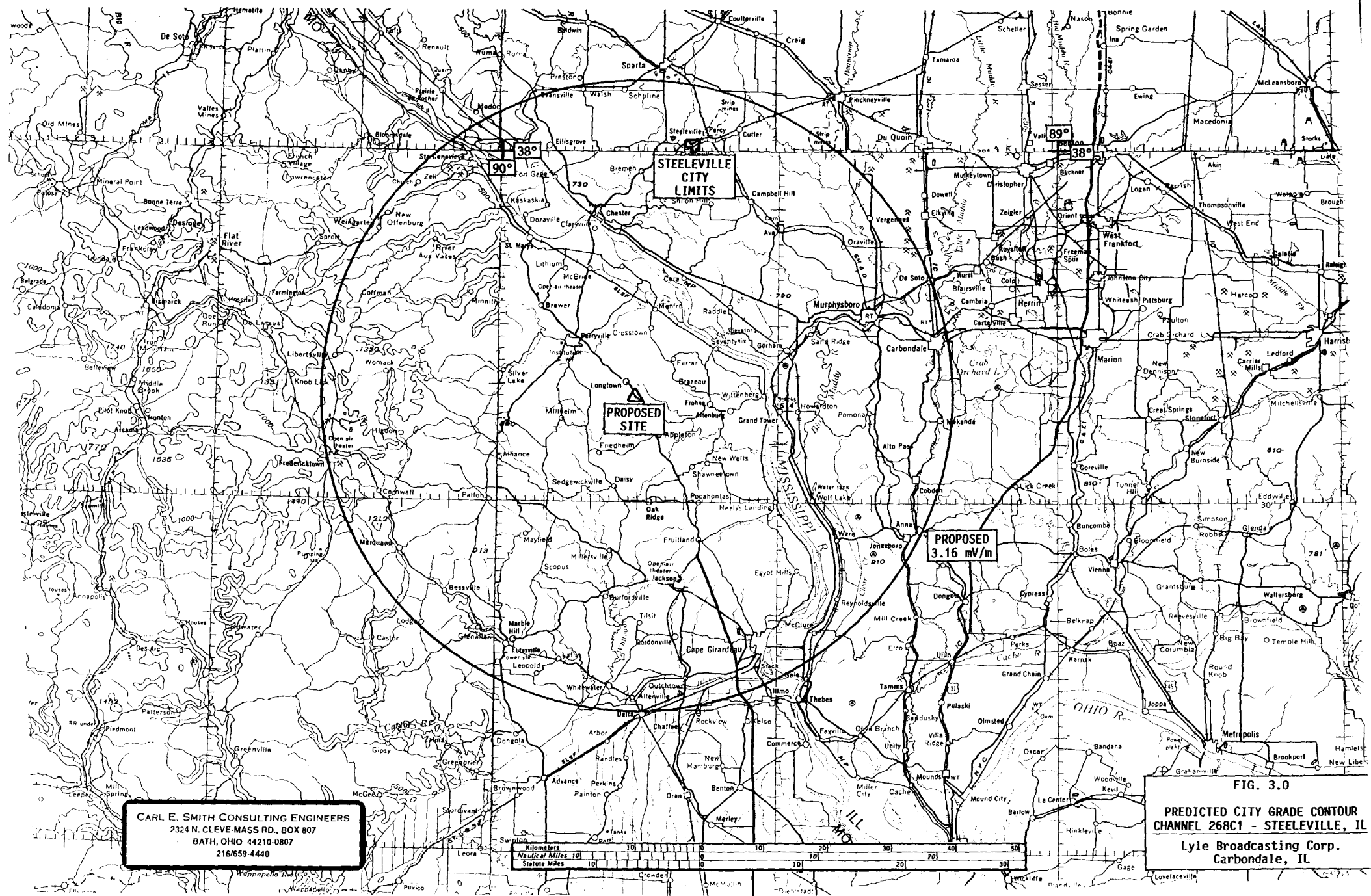
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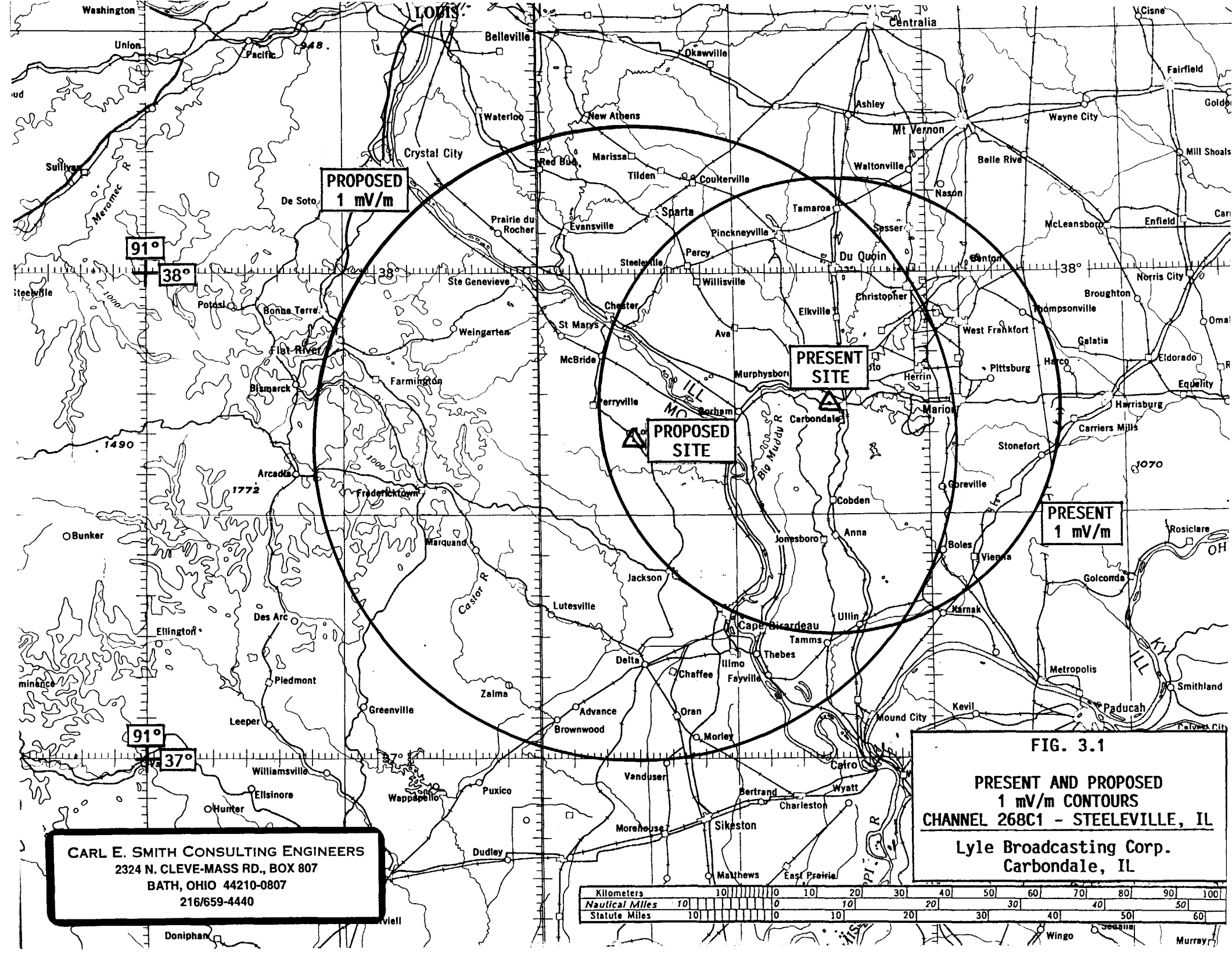
FM ALLOCATION STUDY - CHANNEL 268C1 (101.5 MHz) - STEELEVILLE, IL

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LYLE BROADCASTING CORP.  
CARBONDALE, IL

Notes:

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|--------------------------------------|----------------------------------|
| 1 - Applied For Under Section 73.215 | 7 - Pending Application          |
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**PROPOSED  
1 mV/m**

**PRESENT  
SITE**

**PROPOSED  
SITE**

**PRESENT  
1 mV/m**

**FIG. 3.1**  
**PRESENT AND PROPOSED  
1 mV/m CONTOURS  
CHANNEL 268C1 - STEELEVILLE, IL**  
**Lyle Broadcasting Corp.  
Carbondale, IL**

**CARL E. SMITH CONSULTING ENGINEERS**  
2324 N. CLEVE-MASS RD., BOX 807  
BATH, OHIO 44210-0807  
216/659-4440

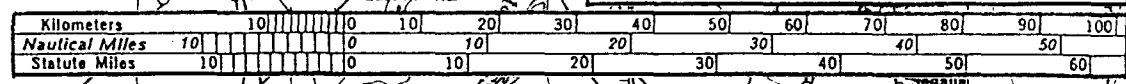


TABLE 3.1

PRESENT AND PROPOSED  
AREA AND POPULATION  
CHANNEL 268C1 - STEELEVILLE, IL

Lyle Broadcasting Corp.  
Carbondale, IL

	<u>Area</u> <u>(Square Kilometers)</u>	<u>Population</u> <u>(1990 Census)</u>
Present	8,560.3	245,026
Gain	10,066.9	182,601
Loss	2,205.2	64,689
Proposed	16,422.0	362,938
Net Gain	7,861.7	117,912

#### 4.0 - CHANNEL 269A IN ARCADIA WILL NOT PROVIDE SECOND AURAL SERVICE

The petition for rulemaking proposing to allot Channel 269A to Arcadia, Missouri, claims that the allotment of this channel will provide a second full time aural service to a portion of the proposed service area. As outlined below, however, this is not the case. In reality, the allotment of Channel 269A to Arcadia would provide a fifth full time aural service to an area of less than 1 square kilometer, with the rest of the proposed service area already receiving five or more full time aural services.

Studies were conducted to identify all other stations which provide full time aural service to any portion of the service area for Channel 269A in Arcadia. For all FM stations, uniform terrain was assumed and all classes of stations were assumed to provide service to their 1 mV/m contour, pursuant to FCC policy. All commercial FM stations, with the exception of Class A and Class C stations, were assumed to be operating with the maximum facilities permitted for their class. Calculations for commercial Class C stations and all noncommercial educational FM stations were based on the stations' actual notified operating facilities. Class A stations were considered to be operating with the greater of their actual operating facilities or the former Class A maximum of 3 kilowatts effective radiated power at 100 meters above average terrain. All AM contours were projected utilizing the notified nighttime facilities for each station and conductivity data from FCC Figure M3. Class A AM stations were considered to provide service to their 0.5 mV/m groundwave contours, while all other AM stations were considered to provide service to their nighttime interference free contour, as defined by Section 73.182 of the FCC Rules. Class D AM stations operating at night with sub-minimum facilities were not considered in these studies, due to the fact that these sta-

tions operate on a secondary basis at night and are considered by the FCC to be day-time only stations, in spite of their limited nighttime facilities.

Table 4.0 is a tabulation of all stations which provide full time aural service to any portion of the service area for Channel 269A in Arcadia. The two stations listed with an asterisk provide full time service to this entire service area, rendering it impossible for a second full time aural service to be provided by this proposed allotment. In fact, however, these 22 stations provide a minimum of four full time aural services to this entire service area, with all but a very small area (less than 1 square kilometer) already receiving five or more full time aural services. Figure 4.0 is a map exhibit depicting the predicted service area for Channel 269A in Arcadia, which also depicts the extremely small area to which such a facility would provide a fourth full time aural service.

In summary, the claim that the allotment of Channel 269A to Arcadia, Missouri, would provide a second full time aural service to any area is absolutely without merit. In reality, the entire service area for such an allotment already receives at least four full time aural services, with all but an area smaller than 1 square kilometer receiving five or more full time aural services.

TABLE 4.0

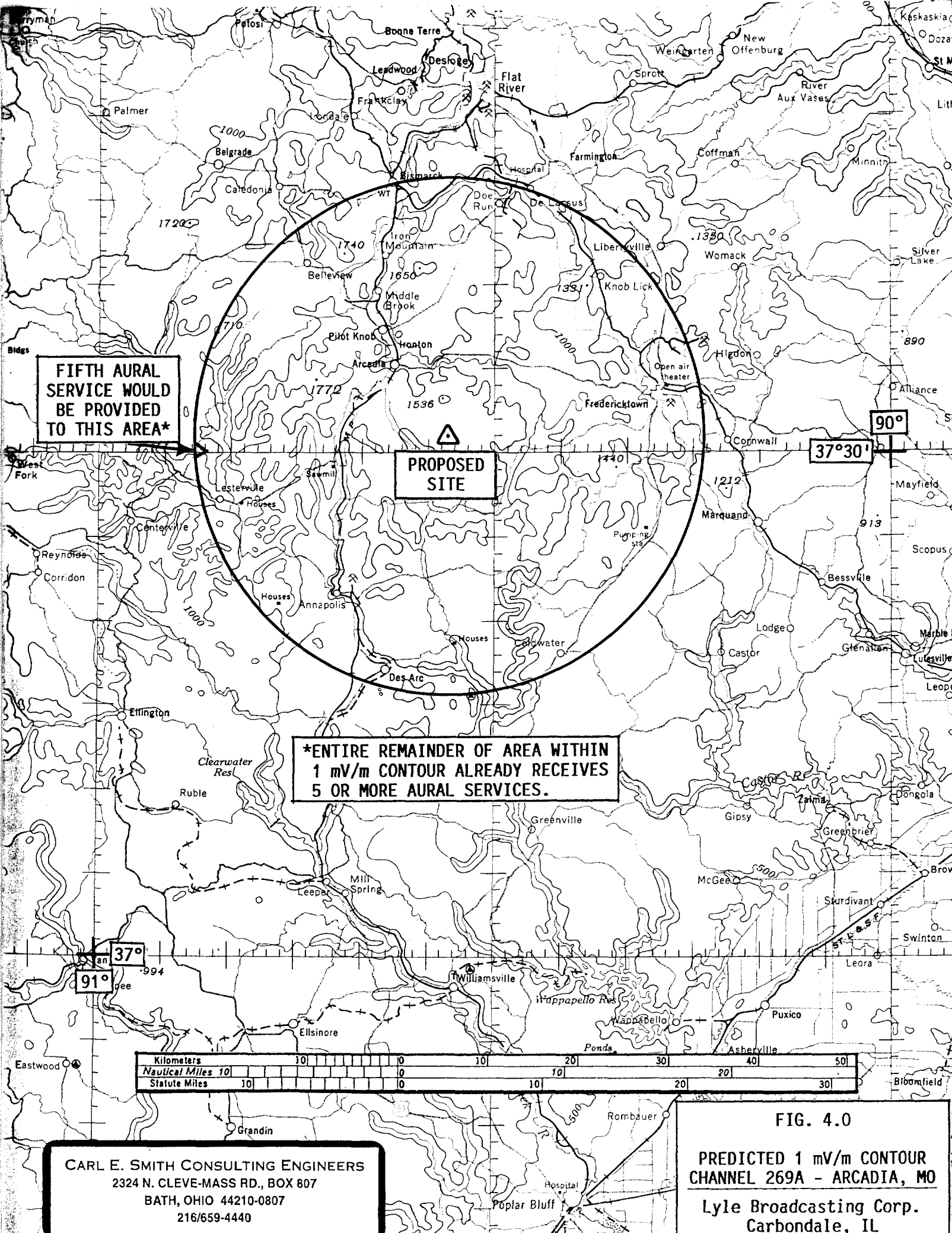
STATIONS PROVIDING FULL TIME  
SERVICE TO PROPOSED SERVICE AREA  
CHANNEL 269A - ARCADIA, MO

Lyle Broadcasting Corp.  
Carbondale, IL

<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
KTRS	550	St. Louis, MO
KJSL	630	St. Louis, MO
KMOX*	1120	St. Louis, MO
KFMO	1240	Flat River, MO
KYLS	1450	Fredericktown, MO
KOKS	208C1	Poplar Bluff, MO
New(CP)	209A	Potosi, MO
KYLS-FM	225A	Ironton, MO
KNSX	227C2	Steelville, MO
KKLR	233C1	Poplar Bluff, MO
KJEZ	238C1	Poplar Bluff, MO
New(CP)	247A	Marble Hill, MO
KHCR	249C3	Potosi, MO
KTJJ*	253C	Farmington, MO
Allotment	258C3	Bismarck, MO
KDJR	261A	De Soto, MO
KGMO	264C	Cape Girardeau, MO
KEZS-FM	275C1	Cape Girardeau, MO
KZMA	278C2	Poplar Bluff, MO
New(CP)	280A	Ellington, MO
KDBB	282A	Bonne Terre, MO
KPWB-FM	285C3	Piedmont, MO

Notes:

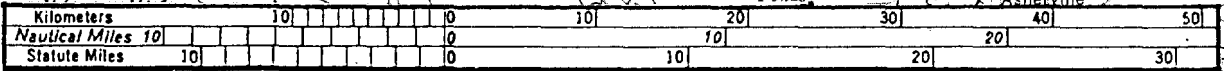
\* - Indicates a station which provides full time service to the entire service area.



FIFTH AURAL  
SERVICE WOULD  
BE PROVIDED  
TO THIS AREA\*

PROPOSED  
SITE

\*ENTIRE REMAINDER OF AREA WITHIN  
1 mV/m CONTOUR ALREADY RECEIVES  
5 OR MORE AURAL SERVICES.



CARL E. SMITH CONSULTING ENGINEERS  
2324 N. CLEVE-MASS RD., BOX 807  
BATH, OHIO 44210-0807  
216/659-4440

FIG. 4.0  
PREDICTED 1 mV/m CONTOUR  
CHANNEL 269A - ARCADIA, MO  
Lyle Broadcasting Corp.  
Carbondale, IL



**CERTIFICATE OF SERVICE**

I, Barbara Lyle, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., do hereby certify that a copy of the foregoing "Comments and Counterproposal" was sent this 22nd day of September, 1997, by first-class United States mail, postage prepaid to:

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